



## MEMO ENDORSED

December 11, 2023

**Via ECF**

Hon. Edgardo Ramos  
United States District Court  
Southern District of New York  
40 Foley Square,  
New York, New York 10007

**Re: Laura Cuba v. Shadwick Inc., et al.**  
**Docket No.: 1:23-CV-05329 (ER)**

Dear Judge Ramos:

This firm represents Plaintiff Laura Cuba in the above-referenced matter brought against Defendants Shadwick Inc. d/b/a The Bravest, and Michael F. Shadwick ("Defendants"), for alleged violations of the Fair Labor Standards Act and the New York Labor Law. We write, with Defendants' consent, to request a thirty-day extension to the deadline for Plaintiff to file her renewed motion for settlement approval. The parties are in the process of adjusting the terms of the settlement agreement per the Court's order to limit the release to wage and hour claims. However, we still need additional time to finalize that language, and for all parties to execute the agreement so that a fully executed agreement may be filed with the parties' renewed motion for settlement approval. Therefore, out of an abundance of caution due to the upcoming holidays, the parties request that the Court extend the deadline for Plaintiff to file her renewed motion for settlement approval by thirty days, from December 11, 2023, to January 10, 2024. This is the first request for an extension of time to file the Plaintiff's renewed motion for settlement approval, and will not impact any other deadlines in this matter.

We thank the Court for its time and consideration. Please let us know if Your Honor needs any further information.

Respectfully,

**/s Matthew J. Farnworth**  
MATTHEW J. FARNWORTH

cc: All counsel of record

The request for an extension to January 10, 2024, to file the renewed motion for settlement approval is granted. SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: December 12, 2023

New York, New York